



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

November 8, 1985

MEMORANDUM

SUBJECT: Preliminary Assessment - Allied Aviation Services - #11065-JW-1219

FROM: ✓ Jeffrey Weatherford *JGW*
Environmental Engineer, SINV/EP&R/ENSV

TO: Robert L. Morby
Chief, SPFD

THRU: Paul E. Doherty
Chief, SINV/EP&R/ENSV

William J. Keffer
Chief, EP&R/ENSV

John C. Wicklund
Director, ENSV

David A. Wagoner
Director, WSTM

On November 1, 1985, I was tasked to perform a preliminary assessment of the Allied Aviation Services Company, Kansas City International Airport (KCI), Kansas City, Missouri. The purpose of this assessment is to determine the potential hazards that pertain to this site and to make recommendations concerning the need for further investigation.

Allied Aviation Services is located in Platte County, Missouri, at the Kansas City International Airport. The Company is owned by Allied Maintenance Corporation, 2 Pennsylvania Plaza, New York, New York 10121. The approximate legal location of the site is SE1/4, SE1/4, Sec.16, T52N, R34W, USGS, Ferrelview, Missouri, 7.5 minute quadrangle. Allied Aviation is currently active in recovering residual "sump" kerosene from fuel tanks and vehicles to store on site until the material can be hauled off for recycling. Recycling is performed by Radium Petroleum Company, 1633 South Marsh, Blue Summit, Missouri 64126 (816/833-1919). In the recycling process, Radium Petroleum combines the "sump" kerosene with No. 5 heating oil to produce No. 4 heating oil.

During contact procedures to confirm Allied's waste disposal practices, it was anonymously reported that Allied was illegally dumping waste into a storm sewer that leads to a lake adjacent to the Marriot Hotel at KCI. This incident is being handled as a spill situation and is currently being investigated by Doris Bender, Missouri Department of Natural Resources (MDNR).

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The initial spill information for this incident can be found under spill report number 11065-JW-1219 which is attached.

Further investigation of Allied Aviation Services as a potential hazardous waste site under CERCLA section 104e is not recommended because Allied is recycling waste off site. However, due to the allegations that Allied is illegally dumping wastes, their Spill Prevention Control and Countermeasures Plan (SPCC) should be inspected on a time available basis.

Attachment



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT**

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

MO

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

Allied Aviation Services

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

Kansas City International Airport

03 CITY

Kansas City

04 STATE 05 ZIP CODE 06 COUNTY

MO 64195 Platte

07 COUNTY CODE 08 CONG DIST

09 COORDINATES LATITUDE

39° 18' 30"

LONGITUDE

94° 42' 40"

SE 1/4, SE 1/4, Sec. 16, T 52 N, R 34 W

10 DIRECTIONS TO SITE (Starting from nearest public road)

I-29 to KCI exit (International way rd.). West on International way to Bern St. North on Bern St. to Brazilia Ave. Tank Farm is at the corner of Brazilia Ave. and Bern St.

III. RESPONSIBLE PARTIES

01 OWNER (if known)

Allied Maintenance Corporation

02 STREET (Business, mailing, residential)

2 Pennsylvania Plaza

03 CITY

New York

04 STATE 05 ZIP CODE

NY 10121

06 TELEPHONE NUMBER

(212) 868-6000

07 OPERATOR (if known and different from owner)

Allied Aviation Services

08 STREET (Business, mailing, residential)

P.O. Box 20446

09 CITY

Kansas City

10 STATE 11 ZIP CODE

MO 64195

12 TELEPHONE NUMBER

(816) 243-5929

13 TYPE OF OWNERSHIP (Check one)

- A. PRIVATE B. FEDERAL: _____ (Agency name) C. STATE D. COUNTY E. MUNICIPAL
 F. OTHER: _____ (Specify) G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

- A. RCRA 3001 DATE RECEIVED: _____ MONTH DAY YEAR B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: _____ MONTH DAY YEAR C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

YES DATE _____ MONTH DAY YEAR
 NO

BY (Check all that apply)

- A. EPA B. EPA CONTRACTOR C. STATE D. OTHER CONTRACTOR
 E. LOCAL HEALTH OFFICIAL F. OTHER _____ (Specify)

CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)

- A. ACTIVE B. INACTIVE C. UNKNOWN

03 YEARS OF OPERATION

BEGINNING YEAR _____ ENDING YEAR _____

UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Jet - A Fuel (Kerosene) and/or aviation gasoline

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

- A. HIGH (inspection required promptly) B. MEDIUM (inspection required) C. LOW (inspect on time available basis) D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

John Enger

02 OF (Agency Organization)

EPA

03 TELEPHONE NUMBER

()

04 PERSON RESPONSIBLE FOR ASSESSMENT

Jeff Weatherford

05 AGENCY

EPA

06 ORGANIZATION

SINV/EP&R/ENSV

07 TELEPHONE NUMBER

(913) 236-3888

08 DATE

11/08/85
MONTH DAY YEAR



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS**

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

01 K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION *(include name(s) of species)*

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

01 L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

01 M. UNSTABLE CONTAINMENT OF WASTES
(Spills, runoff, standing liquids, leaking drums)
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION *During contact procedures it was reported that Allied was spilling Jet-A Fuel into storm sewer. This incident is being investigated per spill report # 11065-JW-1219*

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

01 N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

01 O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION *spill report # 11065-JW-1219*

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

01 P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION *spill report # 11065-JW-1219*

02 OBSERVED (DATE: _____) POTENTIAL ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

The Missouri Department of Natural Resources is currently investigating the reported spill incident, alleging Allied of illegal dumping practices

V. SOURCES OF INFORMATION *(Cite specific references, e.g. state files, sample analysis reports)*



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 A. GROUNDWATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 B. SURFACE WATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION Lake at Marriot Hotel
was reportedly being contaminated by Allied
Spill report # 11065-JW-1219

01 C. CONTAMINATION OF AIR 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 D. FIRE/EXPLOSIVE CONDITIONS 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 E. DIRECT CONTACT 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 F. CONTAMINATION OF SOIL 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

01 G. DRINKING WATER CONTAMINATION 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 H. WORKER EXPOSURE/INJURY 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 I. POPULATION EXPOSURE/INJURY 02 OBSERVED (DATE: _____) POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

RECEIVED
APR 2 1984
SUPERFUND SECTION
(212) 888-6000
572-4036

ALLIED MAINTENANCE CORPORATION

*Two Pennsylvania Plaza
New York, N. Y. 10121*

April 19, 1984

Ms. Katie Biggs
Chief, Superfund Section
U.S. Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

RE: Allied Aviation Fueling Facilities - St. Louis and Kansas City
International Airports

Dear Ms. Biggs:

This letter confirms the discussion held during the April 11 meeting regarding waste disposal activities at the Allied Aviation fueling facilities at St. Louis and Kansas City International Airports. Present for Allied were myself, and Bruce Pashley, Director of Fueling for Allied. Present for the U.S. Environmental Protection Agency, Region VII, ("EPA") besides yourself were John Enger, Superfund Section, Mark Rivas, State Program Section, and Jane Werholtz of the EPA Office, Regional Counsel.

Mr. Pashley described Allied's fueling operations at the two airports. The company fuels jet aircraft at the two airports with Jet-A fuel (kerosene) and fuels propeller aircraft with aviation gasoline at Kansas City International Airport. We provided you at the meeting with the American Society for Testing and Materials standards D-1655 and D-910 (Copyright 1982) which contained a listing of the various properties and characteristics of Jet-A (kerosene) and aviation gasoline. Mr. Pashley stated that there are two by-products from these fueling operations - coalescers (filters) which remove water, and particulate matter from the fuel and, in the case of Jet-A (kerosene) residual "sump" kerosene. The "sump" kerosene is sold, at each airport, to fuel recyclers, who combine it with No. 5 heating oil to produce No. 4 heating oil. The fuel recycler at St. Louis is Midwest Oil & Refining Company, 1900 Watson Road, St. Louis, Missouri 63114, Telephone Number (314) 427-2662. The fuel recycler at Kansas City is Radium Petroleum Company, 1633 South Marsh, Blue Summit, Missouri 64126, Telephone Number (816) 833-1919. The used coalescers are taken

off-site, at each airport, by hauling contractors and deposited in sanitary landfills. The hauling contractor at St. Louis is Browning-Ferris Industries, 11506 Bowling Green Drive, St. Louis, Missouri 63141, Telephone Number (314) 567-3330 and this company takes the filters to West Lake Landfill, 13570 St. Charles Rock Road, Bridgeton, Missouri, Telephone Number (314) 739-1112. The hauling contractor at Kansas City is Browning-Ferries Industries of Kansas City, Inc., 3150 North 7th Street, Kansas City, Missouri 66115, Telephone Number (913) 281-4343. This company takes the coalescers to Plattco Landfill, County Road FF, seven miles west of Parkville, Missouri.

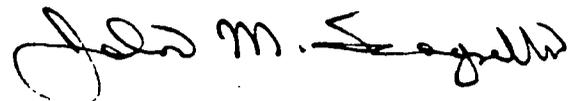
We further informed you that Allied has never considered either the residual "sump" kerosene or the coalescers as "hazardous" waste for purposes of the Resource Conservation and Recovery Act (the "Act"). We feel that the "sump" fuel is exempt from regulation due to the fact that it is beneficially reused and recycled. The coalescers, we believe, neither exhibit the properties of a "hazardous" waste for purposes of the Act, nor are they discarded in sufficient quantities to qualify for regulation. At St. Louis, 1,250 filters of the weight of no more of ten pounds each are disposed of annually; at Kansas City, 1,203 of the same weight are disposed of annually. These quantities are sufficiently small to qualify Allied as a small-quantity generator under the Act, even if it were found, contrary to the Company's position, that the filters constitute "hazardous" waste for purposes of the Act.

You expressed an interest in reviewing analyses of the used coalescers and we enclose as Exhibits A & B two analyses run on June 9, 1982, and June 13, 1983, respectively, by the coalescer supplier, Facet Enterprises, Inc., of Tulsa, Oklahoma.

We also mentioned at the meeting that both St. Louis and Kansas City International Airports have Spill Prevention Control and Countermeasures (SPCC) Plans as required by law.

Please let us know if we can provide you with additional information.

Sincerely,



John M. Scagnelli

Enclosures
cc: Bruce Pashley

SPILL REPORT FORM

11/06/85
(Month, Day, Year)

Initials: JW

Time: 1219

11065 -- JW -- 1219
Spill Number

1/1/1
Date Closed

Computer

Distribution

Reviewed

SPILL or NON-SPILL?: 5 (S or N)

REPORTER CODE: 15

TYPE (X-CODE): 2

| | | | | | | | |
|-----------|-----------------|-------------|---------------|--------------------|-------|------------|-------|
| 1-Spiller | 5-IDEG | 9-Other EPA | 13-ES Other | Petroleum | Trans | Fixed fac. | Other |
| 2-BRC | 6-NDIC | 10-NO Other | 14-Other Fed. | Misc. Chem. Spills | 1 | 2 | 3 |
| 3-OSCC | 7-EDNE | 11-IA Other | 15-ANON | PCB Spills | 4 | 5 | 6 |
| 4-NDNR | 8-Priv. Citizen | 12-NE Other | 16-EPA | Other Incidents | 7 | 8 | 9 |
| | | | | | 10 | 11 | 12 |

If OTHER give (Name, Addr. etc.)

OTHER: Reporter will come forward if needed in legal action

>>>>RESPONSIBLE PARTY INFORMATION<<<<

COMPANY: Allied Aviation Services CONTACT NAME:
STREET: KCI International Airport CITY/COUNTY: Kansas City / Jackson
STATE: MO ZIP: TELEPHONE - AREA CODE: (816) 7 DIGIT NO: 243-5930
243-5929

>>>>SPILL INFORMATION<<<<

INCIDENT TYPE: 8 1-Motor Veh. 4-Pipeline 7-Ug Tank 10-Other PROJECT NO:
2-Rail 5-Aircraft 8-Discharge 11-From Fire
3-Marine 6-Tank 9-Fixed Fac. 12-Air Release

SPILL DATE: ongoing TIME: DISCOVERY DATE: 11/06/85 TIME: 1200

SPILL LOCATION: Airport, Marquette Hotel, 117 Brazillia St.

SPILL CITY: Kansas City SPILL COUNTY: Jackson STATE: MO

| | | | |
|---------------------------|---------------------|------------------|-----------------|
| 1-TCB | 9-Waste Oil | 17-Fertilizer | 25-Other |
| 2-Dioxin | 10-Other Oil | 18-Metals | 26-Unknown |
| 3-Crude Oil | 11-Petrol. Solvents | 19-Acids | 27-Radiological |
| 4-Gasoline | 12-Naptha | 20-Org. Solvents | 28-Brine |
| 5-Diesel Oil | 13-Mineral Spirits | 21-Caustics | 29-Sewage |
| 6-Other Dist. Fuel | 14-Agric. Chemicals | 22-Alcohol | |
| 7-Asphalt or Other Resid. | 15-Herbicides | 23-Amine | |
| 8-Animal or Vegetable Oil | 16-Insecticides | 24-Aldehyde | |

EXACT OR OTHER MATERIAL NAME: Jet-A Fuel

AMOUNT SPILLED (> < if needed): > 1000.0 UNIT CODE: 1-Gallons 4-Tons 7-PPM
2-Pounds 5-Sneen 8-Pint
3-Barrels 6-Unknown Qty 9-Quart

AMT. OF MATL. RECOVERED: HOURS SPENT:

>>>>DESCRIPTION OF SPILL<<<<

DESCRIPTION OF SPILL FOR COMPUTER ENTRY: Jet fuel is pouring out of a storm sewer at a steady rate. Spill reporter has seen actual dumping.

*** ANSWER THE FOLLOWING QUESTIONS - Y = YES / N = NO / U = UNKNOWN

Was Oil Involved?: N

Was Material Hazardous?: Y

Was There a Waterway Discharge?: Y

IF SO-Insert WATER-CODE: 6

Was There a Waterway Threatened?: Y

IF SO-Insert WATER-CODE: 3

VALID WATER CODES: 1-River 4-Storm Sewer 7-Pond 10-Reservoir
2-Stream 5-Sanit. Sewer 8-Ditch 11-Canal
3-Creek 6-Lake 9-Ground Water

Was State Notified?: Y

RESPONDING AGENCY: 10

1-EPA/EPA 6-EPA/MDNR 11-EHS/CDC 16-OSHA 21-County
2-EPA/TAT 7-EPA/IDEQ 12-IDEQ 17-FEMA 22-St. Fire Marshal
3-EPA/ARHM 8-EPA/DEC 13-DEC 18-Local Health 23-NDM
4-EPA/PEST 9-EPA/EDHE 14-EDHE 19-Local Fire 24-State Conservation
5-EPA/ERFC 10-MDNR 15-USCO 20-Local Police 25-Other

Did State Investigate?: _____

Was EPA on Scene?: _____

>>>>RESOLUTION SECTION<<<<

RESOLUTION TYPE CODE: _____ 1-Pending 2-Closed RESOLUTION DATE: ____/____/____

DATE STATE RESPONSE RECEIVED: ____/____/____

RESPONSE TYPE CODE: _____ 1-Phys. Removed 5-Diluted 9-Other
2-Neutralized 6-Biodegraded 10-Unknown
3-Stabilized 7-Recycle 11-Pending
4-Incinerated 8-No Cleanup

>>>>DESCRIPTION OF RESPONSE<<<<

DESCRIPTION OF RESPONSE FOR COMPUTER ENTRY:

NOTIFICATIONS: Name, Org., Date, Time, Phone

Dean Martin, MDNR, 11/6/85, 1225, 314/634-2436
Dennis Cooper, Allied Aviation Services, 11/6/85, 1235, 814/243-5929

ADDITIONAL INFORMATION: Dennis Cooper denies any involvement by Allied.